

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF IOWA
EASTERN (DUBUQUE) DIVISION

UNITED STATES OF AMERICA,) No. 16-CR-1021
)
Plaintiff,) **INDICTMENT**
)
vs.) Count 1
MICHAEL VINCENT WOODBERRY) 21 U.S.C. § 846: Conspiracy to
BENT, DENNIS SHARKEY II,) Distribute a Controlled Substance
EDWARD BEHRENS, ADAM)
FULLBRIGHT, CHRIS NAUMAN,) Count 2
JOHN HUSEMANN, HEATHER) 18 U.S.C. § 1956(h): Conspiracy to
HARRIS, ZACH MILLER, and) Commit Money Laundering
JACOB BURTON,) (Bent, Fullbright)
)
Defendants.) Forfeiture
)
)

The Grand Jury charges:

PRESENTED IN OPEN COURT
BY THE
FOREMAN OF THE GRAND JURY
And filed 5/26/2016
ROBERT L. PHELPS, CLERK

Count 1

Conspiracy to Distribute a Controlled Substance

Beginning in about January 2015, and continuing to at least May 2016, in the Northern District of Iowa and elsewhere, defendants MICHAEL VINCENT WOODBERRY BENT, DENNIS SHARKEY II, EDWARD BEHRENS, ADAM FULLBRIGHT, CHRIS NAUMAN, JOHN HUSEMANN, HEATHER HARRIS, ZACH MILLER, and JACOB BURTON, did knowingly and intentionally combine, conspire, confederate, and agree with each other and with persons known and unknown to the Grand Jury, to distribute a mixture or substance containing a

detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 846.

Quantity Allegation

1. The offense alleged herein as committed by MICHAEL VINCENT WOODBERRY BENT, DENNIS SHARKEY II involved 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, which contained 50 grams or more of pure (actual) methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(A).
2. The offense alleged herein as committed by EDWARD BEHRENS, ADAM FULLBRIGHT, CHRIS NAUMAN, JOHN HUSEMANN, HEATHER HARRIS, ZACH MILLER, and JACOB BURTON involved a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(C).

This was in violation of Title 21, United States Code, Section 846.

Count 2

Conspiracy to Commit Money Laundering

Beginning in about January 2015, and continuing to at least May 2016, in the Northern District of Iowa and elsewhere, defendant MICHAEL VINCENT WOODBERRY BENT and ADAM FULLBRIGHT did knowingly and unlawfully combine, conspire, confederate, and agree, with each other and with others known and unknown to the Grand Jury, to commit the following offense against the United States, namely:

- a. to conduct and attempt to conduct financial transactions which involved the proceeds of a specified unlawful activity, that is the distribution of methamphetamine, and, as charged in Count 1 of this indictment, conspiracy to distribute methamphetamine, a

Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), with the intent to promote the carrying on of the specified unlawful activity, knowing that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(A)(i); and

b. to knowingly conduct and attempt to conduct financial transactions affecting interstate and foreign commerce, which transactions involved the proceeds of specified unlawful activity, that is, knowingly and intentionally possessing with intent to distribute methamphetamine, knowing that the transactions were designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, and that while conducting and attempting to conduct such financial transactions, knew that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

This was in violation of Title 18, United States Code, Section 1956(h).

FORFEITURE ALLEGATIONS

1. The allegations contained in Count 1 of this Indictment are hereby

realleged and incorporated by reference for the purpose of alleging forfeitures, pursuant to the provisions of Title 21, United States Code, Section 853.

2. From their engagement in any or all of the violations alleged in Count 1 of this Indictment, the defendants, MICHAEL VINCENT WOODBERRY BENT, DENNIS SHARKEY II, EDWARD BEHRENS, ADAM FULLBRIGHT, CHRIS NAUMAN, JOHN HUSEMANN, HEATHER HARRIS, ZACH MILLER, and JACOB BURTON, shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, all interest in:

- a. Any property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of the conduct alleged in Count 1 of this Indictment; and,
- b. Any property used, or intended to be used, in any manner or part, to commit or facilitate the commission of the conduct alleged in Count 1 of this Indictment.

3. The property referenced in paragraph 2, subparagraphs a and b, includes but is not limited to:

- a. approximately \$24,500 seized on May 5, 2016, from XXXX Joplin Road, Denver, Iowa;
- b. approximately \$11,796 seized on May 5, 2016, from XXXXX State Road 11, Benton, Wisconsin;
- c. approximately \$9,783.28 seized on May 5, 2016, from Dupaco Community Credit Union Accounts belonging to EDWARD BEHRENS;

- d. a 2004 Harley Davidson Fxsti RS, VIN#XXXXXXXXXXXXXX3437 seized on May 5, 2016;
- e. a 2000 Chevrolet Silverado, VIN#XXXXXXXXXXXXXX7316 seized on May 5, 2016; and
- f. all firearms and ammunition involved in the commission of said offense, including firearms seized on May 5, 2016, from XXXXX State Road 11, Benton, Wisconsin and XXXX 265th Avenue, Greeley, Iowa

All pursuant to Title 21, United States Code, Section 853.

A TRUE BILL

s/Foreperson

Grand Jury Foreperson

Date

3/26/k

KEVIN W. TECHAU
United States Attorney

By: *Lisa C. Williams*

LISA C. WILLIAMS
Assistant United States Attorney